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Attorneys for Defendant
CITY AND COUNTY OF SAN FRANCISCO

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

JANE ROE, an individual; MARY ROE, an individual; SUSAN ROE, an individual; JOHN ROE, an individual; BARBARA ROE, an individual; PHOENIX HOTEL SF, LLC, a California limited liability company; FUNKY FUN, LLC, a California limited liability company; and 2930 EL CAMINO, LLC, a California limited liability company,

Plaintiffs,

vs.

CITY AND COUNTY OF SAN FRANCISCO, a California public entity,

Defendant.

Case No. 4:24-cv-01562-JST

**DECLARATION OF ABIGAIL WALD IN
SUPPORT OF DEFENDANT CITY AND
COUNTY OF SAN FRANCISCO'S SUR-
REPLY OPPOSING PLAINTIFFS' MOTION
FOR PRELIMINARY INJUNCTION**

Trial Date: August 10, 2026

Attachments: Exhibits 44-47

1 I, ABIGAIL H. WALD, hereby declare:

2 1. I am a member of the bar of the state of California and counsel of record for defendant
3 City and County of San Francisco. I submit this declaration to support San Francisco's Sur-Reply
4 Opposing Plaintiffs' Motion for Preliminary Injunction. If called as a witness, I could and would
5 testify competently to the matters set forth herein.

6 2. I submitted a declaration in support of San Francisco's Opposition to Plaintiffs' Motion
7 for Preliminary Injunction, which attached Exhibits 1-43. This declaration therefore begins at Exhibit
8 44.

9 3. Attached as Exhibit 44 is a true and correct copy of excerpts of the deposition
10 transcript for DPH employee Dr. Susan Philip, taken on October 28, 2025.

11 4. Attached as Exhibit 45 is a true and correct copy of excerpts of the deposition
12 transcript for non-party Omar Ward, who submitted a declaration with Plaintiffs' Motion for a
13 Preliminary Injunction, taken on November 7, 2025.

14 5. Attached as Exhibit 46 is a true and correct copy of excerpts of the deposition
15 transcript for non-party Joseph Wilson, who is the Executive Director of Hospitality House, taken on
16 November 14, 2025.

17 6. Attached as Exhibit 47 is a true and correct copy of excerpts of the deposition
18 transcript for non-party Dr. Tyler TerMeer, the Chief Executive Officer of SF AIDS Foundation, taken
19 on November 14, 2025.

20
21 I declare under penalty of perjury under the laws of the United States and the State of
22 California that the foregoing is true and correct.

23 Executed on December 12, 2025, at San Francisco, California.

24
25 /s/Abigail H. Wald

26 ABIGAIL H. WALD